

From: David R. Cohen (David@SpecialMaster.Law) <david@specialmaster.law>
Sent: Tuesday, June 2, 2020 4:45 PM
To: mdl2804discovery@motleyrice.com; xALLDEFENDANTS-MDL2804-Service@arnoldporter.com
Subject: Remote Deposition Protocol

[EXTERNAL]

External E-mail

Dear Counsel:

In light of the pandemic, and the discovery that will soon begin in Track 3, I believe we need an Order that sets out the protocol for Remote Video Depositions.

I attach a draft protocol, which I based on similar documents I found in the Proton Pump Inhibitor MDL in DNJ (docket no. 595) and the 3M Combat Arms Earplug MDL in FLND (Pretrial Order #35). Note that, unlike the Proton Pump Order at p.8, my draft protocol does not address sending hard-copy exhibits to the deponent.

I ask you all to meet and confer and see if you can agree to this document, or to any changes/amendments, and let me know by COB June 9.

I also attach a Law360 article on the topic which highlights various issues you should consider.

Thanks.

-David

=====

This email sent from:
David R. Cohen Co. LPA
24400 Chagrin Blvd., Suite 300
Cleveland, OH 44122
216-831-0001 tel
866-357-3535 fax
www.SpecialMaster.law

This communication may contain information that is legally privileged, confidential or exempt from disclosure. If you are not the intended recipient, please note that any dissemination, distribution, or copying of this communication is strictly prohibited. Anyone who receives this message in error should notify the sender immediately by telephone or by return e-mail and delete it from his or her computer.

For more information about Arnold & Porter, click here:
<http://www.arnoldporter.com>